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Federal Communications Commission
Office of Secretary

VIA COURIER (2 copies)

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
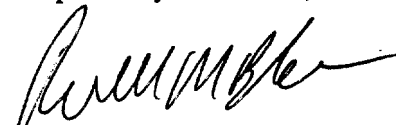1919 M Street, N.W.
Room 222
Washington, D.C. 20554

> Re: Ex Parte Submission, CC Docket No. 96-98, Implementation of the Local
> Competition Provisions of the Telecommunications Act of 1996

Dear Mr. Caton:

Pursuant to 47 CFR § 1.1206(a)(2), this is to advise you that Jason Donahue of
Telesphere Solutions, Inc., and the undersigned met today with staff of the Policy Division of the
Common Carrier Bureau to discuss issues relating to electronic bonding and access to LEC
operations support systems. The attached materials were used during the meeting and summarize
the presentation made by Telesphere Solutions.
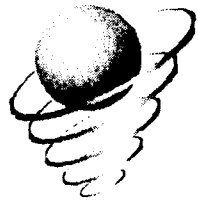
Respectfully submitted,

Russell M. Blau

cc: Robb Tanner   (all w/o encl.)
        Lisa Gelb
        Kalpak S. Gude
        Jason Donahue
        David Fisher, Esq.

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Electronic Communications Briefing to the FCC

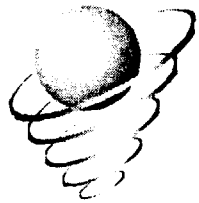Telesphere Solutions, Inc.

December 10, 1996

What Is Electronic Communications?
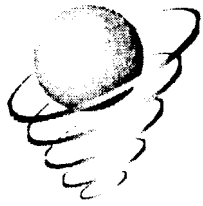
TELESPHERE
S.O.L.U.T.I.O.N.S, I.N.C.

- Electronic communications, or "electronic bonding," is an application to application flow-through interface between two carriers' operations support systems for the purposes of exchanging business-critical information.

Why Should This Matter To The FCC?

- The Telecom Reform Bill requires that RBOCs provide "parity access" to their Operations Support Systems

- RBOC's OSSs are real-time for internal processes today

- Therefore, to achieve parity access, RBOCs must provide automated electronic access to their OSSs.

# Why Should This Matter To The FCC (Continued)?

- Without this automated access, CLECs will be at a dramatic disadvantage in turning up new customers on the incumbent's network

- This access will be required in three key areas- ordering, pre-ordering (inquiry), and trouble administration

- This access requires electronic communications!
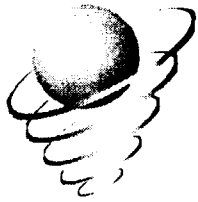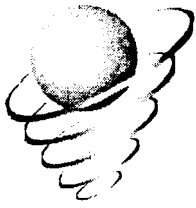
But There's A Big Problem

- Although the RBOCs know they need to provide electronic communications gateways, the Reform Bill was not specific on what interfaces and applications must be supported to meet the 14-point checklist

- Therefore, there is major confusion in the marketplace (and much hedging) as to what will actually be supported by each carrier
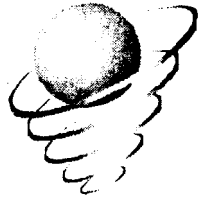
But There's A Big Problem (Cont.)

- Most RBOCs are implementing proprietary graphical user interfaces (GUIs) for 1/1/97. This provides no flow-through to CLEC OSSs, and therefore no parity access

- Also, a proprietary GUI on a carrier-by-carrier basis means "N" GUIs for "N" carriers.

But There's A Big Problem (Cont.)

- Without FCC involvement, local competition will be slowed dramatically because CLECs will be forced to support multiple different interfaces

- Additionally, this will eventually create an unreasonable barrier for CLECs- a different gateway to interface to for each incumbent
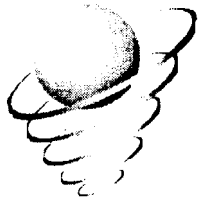
# The Good News- There's Also A Solution, And It Requires FCC Involvement

- There are standards in the marketplace, but there is no *one* standard

- There are so many vested interests that the standards bodies are making very slow progress

- If the FCC provided direction, carriers would move much faster- currently, many are blocking by muddying water
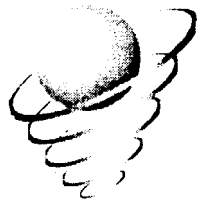
So Who's Telesphere, And Why Do We Know So Much About Electronic Communications?
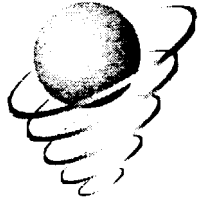
TELESPHERE
SOLUTIONS, INC.

- Telesphere provides leading-edge, standards-based electronic bonding gateway tools and solutions to the telecommunications marketplace

- Electronic communications is Telesphere's only business, and we are intimately involved in resale and unbundling with a number of US carriers
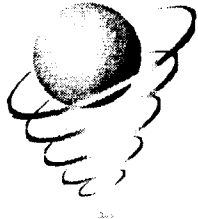
Company Background

- ADC Telecommunications subsidiary
- Silicon Valley-based, telecom-focused software company
- Strong telecommunications experience base
- Active in standards- ECIC, T1M1, etc.
- Technology independent- we implement all of the different EC interfaces

What's Our Interest?

- Like the FCC, Telesphere wants to see local competition move forward, because Telesphere's business revolves around local competition

- Telesphere has no vested interest in any particular technology- we are the only technology independent vendor, since we focus strictly on EC gateway implementations
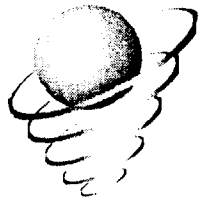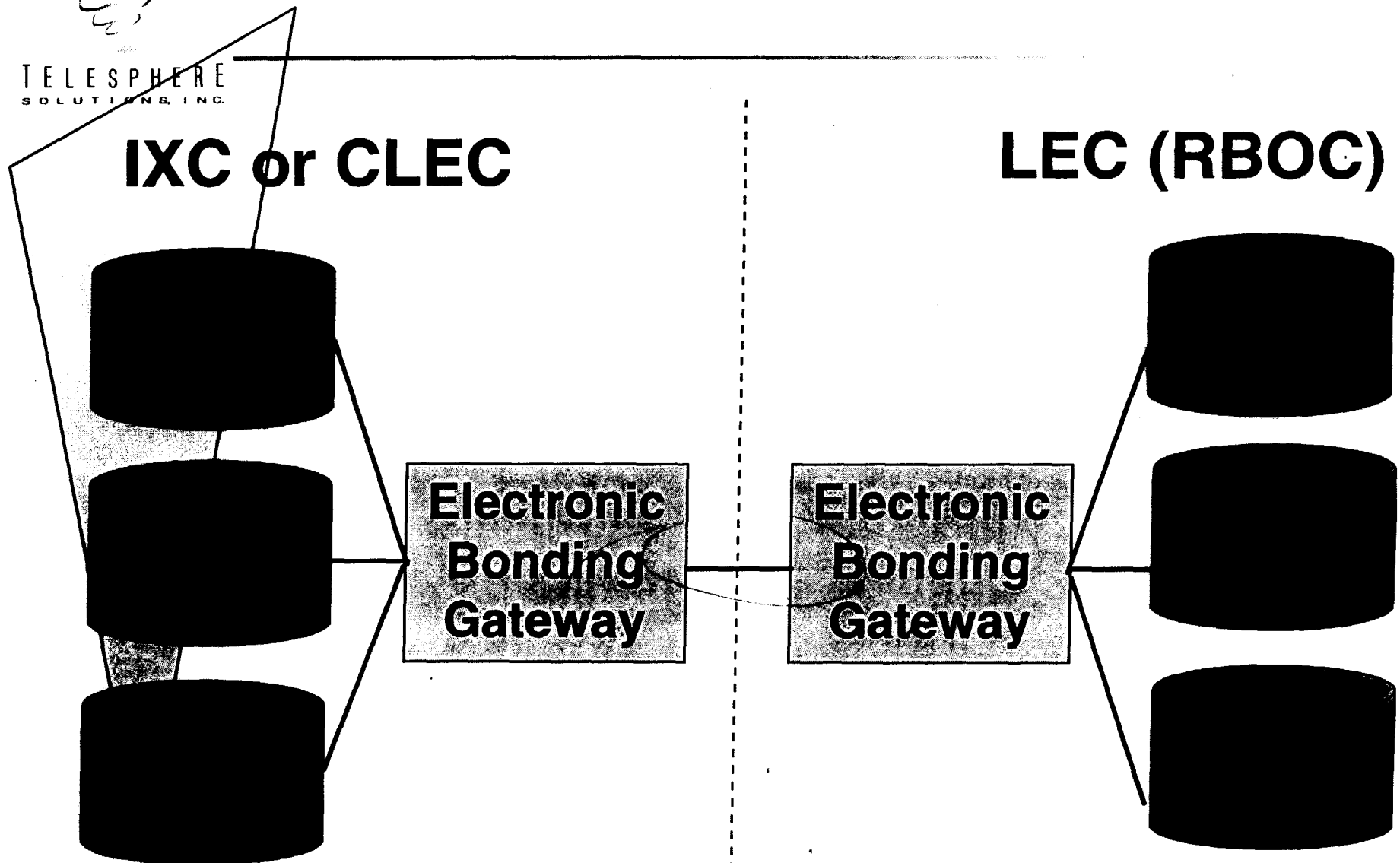
Now Let's Get Back To The Problem (And Solution)

- There are four key standards bodies for EC in the US, and they all fall under ATIS

- These are:
  - Ordering and Billing Forum (OBF)
  - T1M1
  - Electronic Communications Implementation Committee (ECIC)
  - ATIS EDI Subcommittee
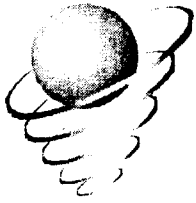
Typical Gateway Application

IXC or CLEC

LEC (RBOC)

Electronic Bonding Gateway

Electronic Bonding Gateway
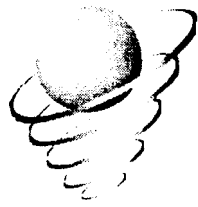
# The Standards Bodies Have Focused On Traditional EB

- Traditional EB revolves around long distance and designed circuits
- RBOC to IXC, typically
- CMISE based, TMN compliant
- 3 key applications-
  - Trouble administration gateways
  - PIC/CARE gateways
  - Ordering gateways

# Second Application Area: Resale, Unbundling Gateways- These Have Different Needs

- Smaller CLECs cannot afford traditional TMN interfaces

- TMN ordering standards not even near ready for resale implementation

- Prominent industry direction- EDI

- Some carriers also providing Web-based proprietary short-term solution

- The OBF has specified EDI as the official direction for resale ordering
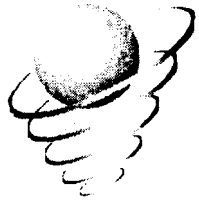
# Second Application Area: Resale, Unbundling Gateways- These Have Different Needs

- Fortuitously, EDI Subcommittee of ATIS specified EDI transaction sets for telecom service ordering

- The more aggressive carriers are implementing EDI interfaces now (for 1/1/96)

- But as you can see, there are many competing standards, and with vested interests, progress is slow
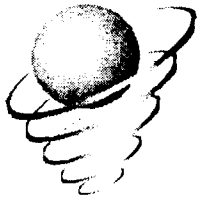
A Little History on EDI

EDI is:

- A universally defined standard for ordering that crosses multiple industries
- Defined for ordering of telecom services
- Used by all large carriers for purchase orders (not necessarily service ordering)
- Being implemented today for service ordering by most large LECs
- Relatively inexpensive to implement
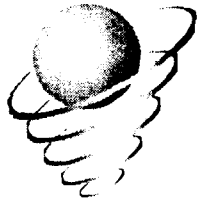
So How Are Carriers Coping?

- Life is difficult for CLECs
- Although there are standards, no two carriers are doing the same thing
- The standards bodies are frankly in a state of chaos
- Under status quo, the market will move very slowly and will adapt with universal gateway technology

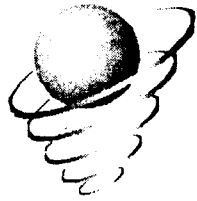# Telesphere Meets This Market Need Under Status Quo

- Telesphere has met the market need in both application areas (traditional and resale) with PowerGATE, the first truly universal, standards-based electronic bonding platform

- PowerGATE supports all of the key standards on one platform- TMN, CMISE, EDI, and HTML (Web)
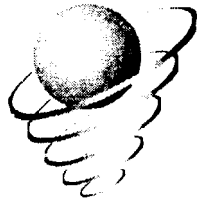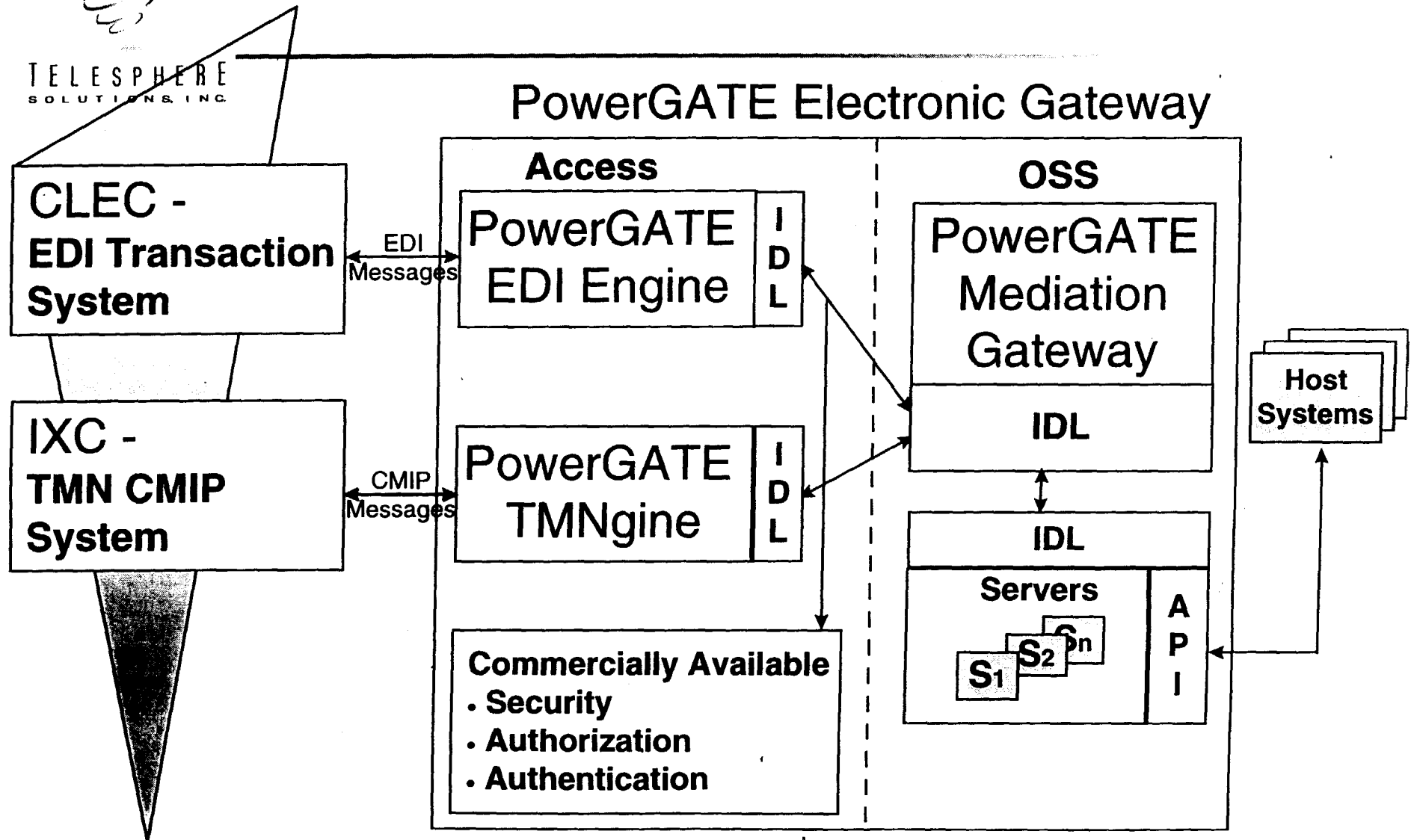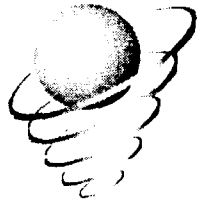
Telesphere's Value Proposition

- Graphical software development toolsets for building standards-compliant applications

- Robust and scaleable runtime applications architecture

- Rapid deployment of complete customer-specific solutions

- Build customer expertise in maintenance and enhancement

Example Solution Architecture

PowerGATE Electronic Gateway

CLEC -
EDI Transaction
System

IXC -
TMN CMIP
System

Access

EDI Messages →

PowerGATE EDI Engine | I D L

CMIP Messages →

PowerGATE TMNgine | I D L

Commercially Available
- Security
- Authorization
- Authentication

OSS

PowerGATE Mediation Gateway

IDL

IDL

Servers

S_1 S_2 S_n

A P I

Host Systems
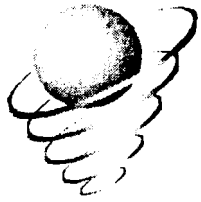
But In Status Quo, No Carrier Comfortable, So Slow Progress

- Currently major uncertainty in marketplace

- CLECs and incumbents cannot afford to implement solutions on the hope they are right, only later to discard

- The solution- the FCC should become involved

The Solution

- EDI has been approved (and is being implemented) as a gateway-to-gateway interface format

- EDI format defined for ordering, but should be extended to specify pre-ordering

- ECIC must work out implementation details

The Solution (Continued)

- It is possible to transport EDI over different interfaces. These include:
  - CMISE (AT&T's EC-Lite)
  - TCP/IP
  - FTP
  - X.400 (e-mail)
- The FCC should require TCP/IP as the lowest common denominator for transport- it is real-time